

**IN THE UNITED STATES BANKRUPTCY COURT  
OF THE DISTRICT OF DELAWARE**

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|                     |   |                                |
|---------------------|---|--------------------------------|
| In re:              | ) | Chapter 11                     |
|                     | ) |                                |
| JOANN Inc., et al., | ) | Case No. 25-10068 (CTG)        |
|                     | ) | (Jointly Administered)         |
| Debtors.            | ) |                                |
|                     | ) |                                |
|                     |   | <b>Re: Docket No. 760, 823</b> |

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**CERTIFICATION OF COUNSEL REGARDING FIRST NOTICE OF  
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY  
CONTRACT AND/OR UNEXPIRED LEASES**

I, Garvan F. McDaniel, counsel to Progress Square Partners Limited Partnership, an Oregon limited partnership, and DC Cotton Mill, LLC, a California limited liability company, as tenants in common (collectively, the “Landlord”), hereby certify as follows:

1. On April 28, 2025, Debtors filed their *First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* (the “Assumption Notice”) [Docket No. 760].
2. On May 7, 2025, the Landlord filed its *Objection to First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* (the “Objection”) [Dkt. No. 823].
3. On May 16, 2025, Debtors filed an amended Assumption Notice [Docket No. 930].
4. On July 28, 2025, Debtors filed a Reply in Support of its Assumption Notice [Docket No. 1457] (the “Reply”).
5. On July 31, 2025, a hearing was held on the Assumption Notice, Objection and related filings (the “Hearing”).
6. Landlord has revised the proposed order attached to the Assumption Notice to reference the Objection and the Hearing. Further the order was revised to reference the Court’s

ruling on the Objection. The revised proposed order is attached hereto as **Exhibit A**. The blackline version of the proposed order is attached hereto as **Exhibit B**.

WHEREFORE, the undersigned, respectfully requests that the Court approve the Order attached hereto at the Court's earliest convenience.

Date: July 31, 2025

*/s/ Garvan F. McDaniel*  
Garvan F. McDaniel (#4167)  
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